

# **EXHIBIT 3**

**From:** [Robert MacGill](#)  
**To:** [Kathy Klein](#)  
**Cc:** [Scott Klein](#); [Scott Murray](#); [Steve Mintz](#); [patrick.sanders@macgilllaw.com](mailto:patrick.sanders@macgilllaw.com)  
**Subject:** Re: FW: Hunt v. SBC et al  
**Date:** Monday, February 5, 2024 3:05:03 PM  
**Attachments:** [image001.png](#)

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Kathy,

We will not agree to your proposed Order.

Guidepost has abused the AEO designation and impaired discovery as a result. The abuses are so widespread that a description of the details is not possible within the confines of an email. We propose a meet and confer with Steve once the Court rules on our Second Motion to Compel.

Best regards.

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P Please consider the environment before printing this email.

On Mon, Feb 5, 2024 at 3:59 PM Kathy Klein <[KKlein@rjfirm.com](mailto:KKlein@rjfirm.com)> wrote:

Rob, Scott and Patrick:

Following up with you all on this proposed Second Amended Agreed Protective Order. Please let us know if we can file this proposed Order as unopposed.

Kathy

Text ☐ ☐ Description automatically generated



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**From:** Kathy Klein

**Sent:** Wednesday, January 31, 2024 12:10 PM

**To:** [robert.macgill@macgilllaw.com](mailto:robert.macgill@macgilllaw.com); Scott Murray <[scott.murray@macgilllaw.com](mailto:scott.murray@macgilllaw.com)>;  
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<[JJacobson@rjfirm.com](mailto:JJacobson@rjfirm.com)>

**Subject:** Hunt v. SBC et al

Rob, Scott and Patrick:

In an effort to address concerns raised by several third party subpoena recipients and to facilitate document productions, we've made some suggested changes to the Agreed Protective Order to ensure that the third parties are covered by the Order's provisions. Please take a look at the attached and let us know if we have your consent to file an unopposed motion to amend the attached protective order.

Kathy

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